

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE § **CASE NO. 15-10109-HCM**
§
COINTERRA, INC. §
§
DEBTOR § **CHAPTER 7**

**MOTION TO REJECT UNEXPIRED NON-RESIDENTIAL
LEASES WITH INFINITI INVESTORS, LLC**

This pleading requests relief that may be adverse to your interests.

If no timely response is filed within twenty-one (21) days from the date of service, the relief requested herein may be granted without a hearing being held. A timely filed response is necessary for a hearing to be held.

TO THE HONORABLE H. CHRISTOPHER MOTT, U. S. BANKRUPTCY JUDGE:

COMES NOW Randolph N. Osherow, Trustee in the above referenced proceeding ("Trustee"), and pursuant to 11 U.S.C. § 365, files this *Motion to Reject Unexpired Non-Residential Leases with Infiniti Investors, LLC*, and in support thereof would respectfully show the Court the following:

1. Debtor filed its voluntary petition for relief pursuant to Chapter 7 of Title 11 of the United States Code on January 24, 2015, at which time Randolph N. Osherow was appointed as trustee.

2. Trustee moves the Court to approve rejection of the Debtor's three (3) leases with Infiniti Investors, LLC ("Lessor" or "Landlord") effective January 24, 2015.

3. The leases are contracts for the lease of commercial real property located at 11130 Jollyville Road, Suites 100, 200, and 303, Austin, Texas 78759. It is Trustee's business judgment that rejection of these commercial leases is in the best interest of the estate in this case.

4. The Trustee has elected to file this Motion prior to the automatic rejection of the leases pursuant to 11 U.S.C § 365 in order to avoid the administrative claim of the Landlord for the period of time prior to the automatic rejection of the Lease. Based upon information and belief, the Debtor was not in default of any aspect of the Lease as of the date of filing. Specifically, the rent for all three leases has been paid through April 2015.

5. Immediately upon entry of an order approving rejection of the leases, Landlord may take such actions as are appropriate under the terms of the leases to terminate any sub-lease or take possession of the leasehold.

6. The bar date for filing proofs of claim in this case is May 27, 2015. Landlord shall file a Proof of Claim setting forth its lease rejection damages, if any.

WHEREFORE, Trustee asks that the Court approve rejection of the leases with Infiniti Investors, LLC, and for such other relief as he may show himself justly entitled.

Respectfully submitted,

BARRETT DAFFIN FRAPPIER
TURNER & ENGEL, LLP

By: /s/ Steve Turner

Steve Turner
State Bar No. 20341700
610 West 5th Street, Suite 602
Austin, Texas 78701
Phone: (512) 687-2500
Fax: (512) 477-1112
SteveT@BDFGroup.com

ATTORNEYS FOR RANDOLPH N. OSHEROW,
CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that on the 7th day of April, 2015, a true and correct copy of the foregoing document was served upon the parties on the attached mailing matrix via electronic means as listed on the Court's ECF noticing system, by email (as indicated on the matrix) or by regular first class mail.

/s/ Steve Turner
Steve Turner

ERIC PETERSON
156 PARK DR
EASTCHESTER NY 10709-5109

MICHAEL VICK
C/O WILLARD PROCTOR JR
ATTORNEY LAW LAW
2100 WOLFE ST
LITTLE ROCK AR 72202

FUTURE ELECTRONICS CORP
C/O LYNN SAARINEN
BARRON & NEWBURGER PC
1212 GUADALUPE STE 104
AUSTIN TX 78701

BDO USA LLP
ATTN LAURENCE W GOLDBERG
DIRECTOR REVENUE MGMT
4135 MENDENHALL OAKS PKWY
STE 140
HIGH POINT NC 27265-8143

WALTER THAMM
ALBRECHTSTRASSE 1
D-88316 ISNY IM ALLGAEU
GERMANY 88316
w.thamm@gmx.net

FORTIS ADVISORS LLC AS CA
C/O E P KEIFFER
WRIGHT GINSBERG BRUSILOW PC
325 N ST PAUL ST STE 4150
DALLAS TX 75201

C7 DATA CENTERS INC
C/O R ADAM SWICK
REID COLLINS & TSAI LLP
1301 S CAPITAL OF TX HWY
BLDG C STE 300
AUSTIN TX 78746

TEXAS COMPTROLLER
C/O KIMBERLY A WALSH AAG
C/O SHERRI K SIMPSON PARALEGAL
BANKRUPTCY & COLLECTIONS DIV
PO BOX 12548
AUSTIN TX 78711-2548

OPEN-SILICON INC
C/O TIMOTHY R CASEY
DRINKER BIDDLE & REATH LLP
191 N WACKER DR STE 3700
CHICAGO IL 60606-1698

BCF LLP
1100 RENE LEVESQUE BLVD W
25TH FL
MONTREAL QUEBEC CA H3B-5C9
martine.samuel@bcf.ca

ZACHARY CULLEN
8268 MAN O WAR RD
PALM BEACH GARDENS FL 33418

MCGRATH RENTCORP
DBA TRS-RENTELCO
PO BOX 619260
DFW AIRPORT TX 75261

SEBASTIAN TARACH
MILA 11
DZIEKANOW LESNY
POLAND 05-092
sebastian.tarach@gmail.com

TEKHNE LLC
21725 SW 187 AVE
MIAMI FL 33170

BRETT HANSMEIER
100 OLD RIVER RD STE 100
ANDOVER MA 01810

FUTURE ELECTRONICS CORP
41 MAIN ST
BOLTON MA 01740

JASON KUSUMA
2315 EASTRIDGE AVE APT 714
MENLO PARK CA 94025

KIT HUI
16912 NE 107TH ST
REDMOND WA 98052

MARK KIM
3427 RIDGE RD
LANSING IL 60438

CHRISTOPHER SNOOK
25457 SE 42ND PL
ISSAQAH WA 98029

RYAN JAUREGUI
14272 CAMERON LN
SANTA ANA CA 92705

YEWULSEW AMARE
8328 TRIBUTE LN
LAS VEGAS NV 89147

AFZAL AHMED
66A ROBERT FORD RD
WATERTOWN MA 02472

BEN HENNEMAN
1 THE COURTYARD
GAS STREET BIRMINGHAM
WEST MIDLANDS
GREAT BRITAIN B1 2JT
ben@stunn.co.uk

MATTHEW KNIGHT
9 HARRISON CLOSE
BRANSTON STAFFORDSHIRE
GREAT BRITAIN DE14 3EF
mattkn@hotmail.co.uk

JOHN DURCAN
G09 A POWER ROAD STUDIOS
114 POWER ROAD
CHISWICK LONDON
GREAT BRITAIN W4 5PY
john@hotcow.co.uk

ARROW ELECTRONICS INC
C/O NAC RISK RECOVERY
7459 S LIMA ST
ENGLEWOOD CO 80112

VIRITON LLP
15070 E WAGONTRAIL PL
AURORA CO 80015

AUSTIN FOAM PLASTICS INC
ATTN GRETCHEN SHIPMAN
2933 A W GRIMES BLVD
PFLUGERVILLE TX 78660-5292

JAN TURZA
BEETHOVENOVA 10
NITRA SLOVAK REPUBLIC 94911
jan.turza@gmail.com

BRIAN CHASE
445 AULDON CT SE
SMYRNA GA 30082

ELIRAN ITZHAKI
5 LANDAU APT 7
RAMAT GAN ISRAEL 52282
lalo.tfg@gmail.com

KEVIN SCHMITZ
SALWEIDENBECKE 21
BOCHUM GERMANY 44894
schmitz86@gmail.com

CADENCE DESIGN SYSTEMS INC
C/O COMMERCIAL COLLECTION CON
16830 VENTURA BLVD STE 620
ENCINO CA 91436

ERICK ARGUETA
7601 E TREASURE DR APT 1107
NORTH BAY VILLAGE FL 33141

CHUNLIU SHEN
56 FFORDD DRYDEN KILLAY
SWANSEA WALES
GREAT BRITIAN SA2 8PP
xandsuk@hotmail.com

WILLIAM GASKINS
734 - 15TH ST NW STE 1200
WASHINGTON DC 20005

TOM BELANGER
515 DU PARC INDUSTRIEL
LONGUEUIL QC CANADA J4H 3V7
tbelanger@saic.ca

SEAN SADEL-STEVENS
4885 BURDE ST
PORT ALBERNI BC CANADA V9Y 3J7
c6number2@gmail.com

GABRIEL POLITZER
491 ARVIDA PKWY
MIAMI FL 33156

NAMPIL CHOUSEIN
I STAIKOU 2
AGRINIO AITOLOAKARNANIA
GREECE 30100
nabilhussein1@hotmail.com

BILL CHOW
19745 COLIMA RD STE 1-128
ROWLAND HEIGHTS CA 91748

MIQUEL AXEL ESTELRICH RULLAN
C SEBASTIA RUBI 3A
MANACOR PM SPAIN 7500
saucraban@gmail.com

INDIUM CORPORATION OF AMERICA
ATTN LINDA HILL
34 ROBINSON RD
CLINTON NY 13323

KOURNIKOV ANDREI DAPFOR
18 ALLEE DE LA PAGERIE 92500
RUEIL MALMAISON FRANCE
akournikov@gmail.com

MARTIN NACHEV
DEFENCE CLOSE
FLAT 57 HILL HOUSE
LONDON LONDON
GREAT BRITIAN SE28 0NQ
mnachev1@gmail.com

RAMAKANTH GOURU
12881 DEER PARK LN
ALPHARETTA GA 30004

WILSON SONSINI ET AL
650 PAGE MILL RD
PALO ALTO CA 94304-1050

TEXAS WORKFORCE COMM
REGULATORY INTEGRITY DIV - SAU
101 E 15TH ST RM 556
AUSTIN TX 78778-0001

P R C FERNANDO
VIALE IGNAZIO SILONE 187,35A
ROME ITALY 00143
ruwa777@gmail.com

ERIC NYDEGGER
TORY 5
GRANGES-PACCOT FR
SWITZERLAND 1763
eric@nydegger.biz

GLYN LEWIS
26320 GRANT AVE
MAPLE RIDGE BC CANADA V2W 1H2
glyn@superlewis.com

STUART CABORN
5 KNIGHTSBRIDGE DR
HEADLEY THATCHAM
HAMPSHIRE GREAT BRITIAN RG19 8JZ
stuart.caborn@gmail.com

COINTERRA INC
MEHDI SOLEMANKHANI
1249 - 15TH ST
LOS OSOS CA 93402

ERIC CONKLE
915 S DALEY
MESA AZ 85204

MICHAEL VICK
1512 S BATTERY ST
LITTLE ROCK AR 72202

MIKULAS KISS
DURCANSKEHO 1
NITRA SLOVAK REPUBLIC 94901
mikulas.kiss@gmail.com

NATHAN DAVIS
7514 SHERMAN DR
LINCOLN NE 68134

BRENDAN MURRAY
11 BRIDGE ST
HAMILTON NSW AUSTRALIA 2303
ecflux@gmail.com

STANLEY WING HONG LEUNG
448 PRINCE EDWARD RD WEST
PRINCE RITZ 10/F BLOCK C
HONG KONG KOWLOON HONG KONG
stanley.leung@fitflop.com

LAUTARO CLINE
C/O DANIEL M COYLE
ASTIGARRAGA DAVIS ET AL
1001 BRICKELL BAY DR 9TH FL
MIAMI FL 33131

JOSHUA JONG
6 DUNNOCK PL
WIDEOOPEN NEWCASTLE UPON TYNE
TYNE AND WEAR NE13 6LE
UNITED KINGDOM
joshuajong@outlook.com

HEIKO JUCH
AM ZOLLSTOCK 16
OBERSUELZEN GERMANY 67271
hjuch@hotmail.com

MICHAEL POOLMAN
18 HAMPTON CLOSE
CADBURY HEATH
BRISTOL AVON
GREAT BRITAIN BS30 8EY
mpoolman@hotmail.com

MR BALBIR
AKA BILL CHEPAL
8042 COOPERHAWK COURT
SURREY BC CANADA V3W 0V1
b.d.chepal@shaw.ca

QUAIL ELECTRONICS
2171 RESEARCH DR
LIVERMORE CA 94550

J NOS RICHTER
RAUMERSTR 38
BERLIN GERMANY 10437
janos.richter@me.com

MIKLOS GAEBLER
WAGNERSTRASSE 6666
POTSDAM GERMANY 14480
miklos.gaebler@gmx.net

DAVID G P ALLAN
90 WINCHESTER ST
TORONTO ON CANADA M4X 1B2
davidgpallan@gmail.com

JESSICA IERACI
PIAZZA SANT' AMBROGIO 06
MISINTO
MONZA E BRIANZA ITALY 20826
manuel.online1919@gmail.com

DIRAN MARTIN YOUSOUFIAN
MORENO 1183
4TO "A" CP 2000
ROSARIO SANTA FE ARGENTINA AK 1-1
dmy@areacotrosario.com.ar

SHU DONG
120 HAVENUEN BLUFF
ALPHARETTA GA 30022

MICHAEL PEACOCK
14D PARLIAMENT ST
LOWER HUTT
NEW ZEALAND 5010
michaelnz@msn.com

UNITED PARCEL SERVICE
C/O RECEIVABLE MGMT SERVICES
PO BOX 4396
TIMONIUM MD 21094

COINTERRA INC
11130 JOLLYVILLE RD STE 303
AUSTIN TX 78759

TIMOTHY A DAVIDSON II
ANDREWS KURTH LLP
600 TRAVIS STE 4200
HOUSTON TX 77002

OFFICE OF THE U S TRUSTEE
903 SAN JACINTO BLVD STE 230
AUSTIN TX 78701

RANDOLPH N OSHEROW
CHAPTER 7 TRUSTEE
342 W WOODLAWN STE 100
SAN ANTONIO TX 78212